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SFBSC Management, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JANE ROE, on behalf of herself and all
others similarly situated,

Plaintiff,

v.

SFBSC MANAGEMENT, LLC; and
DOES 1-200,

Defendants.

Case No. 3:14-cv-03616-LB

**DECLARATION OF DOUGLAS J.
MELTON IN SUPPORT OF MOTION TO
COMPEL ARBITRATION RE JANE ROE
1 AND 2**


Date: January 29, 2015
Time: 9:30 a.m.
Place: Courtroom C, 15th Floor
Judge: Hon. Laurel Beeler

1 I, Douglas J. Melton, declare:

2 1. I am a partner with Long & Levit LLP, counsel for Defendant SFBSC
3 MANAGEMENT, LLC ("SFBSC"). I have personal knowledge of all facts set forth in this
4 declaration and, if called to testify as a witness, I could and would competently testify thereto.

5 2. On December 9, 2014, I sent Plaintiffs' counsel demands, on BSC's behalf, that
6 Plaintiffs each submit their purported claims against BSC to individual arbitration. Enclosed with
7 those demands were unredacted copies of the Performer Contracts signed by both Plaintiffs that
8 contain the arbitration provisions supporting BSC's demand for arbitration. As of the filing of
9 this motion to compel arbitration, Plaintiffs' counsel did not respond to BSC's demand. BSC
10 interprets this silence as Plaintiffs' refusal to submit their claims individual arbitration absent a
11 court order.

12 I declare under penalty of perjury, under the laws of the United States of America, that the
13 foregoing is true and correct and that this declaration was signed at San Francisco, CA on
14 December 22, 2014.



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16 DOUGLAS J. MELTON